

KEMENY, RAMP & RENAUD, LLC

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Attorneys for Defendant, Betty Sebrow, improperly pled as Baila Sebrow

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOHN DOE,

Plaintiff,

v.

BAILA SEBROW,

Defendant.

Civil Action No.

2:21-cv-20706 (MEF) (SDA)

**ANSWER TO THE AMENDED
COMPLAINT AND
AFFIRMATIVE DEFENSES**

ANSWER TO THE AMENDED COMPLAINT

Defendant, Betty Sebrow, improperly pled as “Baila Sebrow” by way of

Answer to the First Amended Complaint hereby states as follows:

PRELIMINARY STATEMENT

1. The allegations contained in Paragraph 1 of the Amended Complaint are denied.

2. The allegations contained in Paragraph 2 of the Amended Complaint are denied, except to state that Defendant is a matchmaker.

3. The allegations contained in Paragraph 3 of the Amended Complaint are denied.

4. The allegations contained in Paragraph 4 of the Amended Complaint are denied.

5. The allegations contained in Paragraph 5 of the Amended Complaint are denied.

6. The allegations contained in Paragraph 6 of the Amended Complaint are denied.

7. The allegations contained in Paragraph 7 of the Amended Complaint are denied.

8. The allegations contained in Paragraph 8 of the Amended Complaint are denied.

9. The allegations contained in Paragraph 9 of the Amended Complaint are denied.

10. The allegations contained in Paragraph 10 of the Amended Complaint are denied.

11. The allegations contained in Paragraph 11 of the Amended Complaint are a legal conclusion to which no response is required. To the extent that a response is required, the allegations are denied.

THE PARTIES

12. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 12 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

13. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 13 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

14. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 14 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

15. The allegations contained in Paragraph 15 of the Amended Complaint are admitted.

16. The allegations contained in Paragraph 16 of the Amended Complaint are admitted.

17. The allegations contained in Paragraph 17 of the Amended Complaint are denied.

JURISDICTION AND VENUE

18. The allegations contained in Paragraph 18 of the Amended Complaint set forth a legal conclusion to which no response is required. To the extent that a response is required, Plaintiff denies the allegations.

19. The allegations contained in Paragraph 19 of the Amended Complaint set forth a legal conclusion to which no response is required. To the extent that a response is required, Plaintiff denies the allegations.

FACTUAL ALLEGATIONS

The Parties' Relationship

20. The allegations contained in Paragraph 20 of the Amended Complaint are denied.

21. The allegations contained in Paragraph 21 of the Amended Complaint are denied.

22. The allegations contained in Paragraph 22 of the Amended Complaint are admitted.

23. The allegations contained in Paragraph 23 of the Amended Complaint are denied, except to state that Plaintiff approached Defendant, they spoke over the phone, and Defendant met Plaintiff at Plaintiff's request at the hotel lounge.

24. The allegations contained in Paragraph 24 of the Amended Complaint are denied.

25. The allegations contained in Paragraph 25 of the Amended Complaint are denied.

26. The allegations contained in Paragraph 26 of the Amended Complaint are denied.

27. The allegations contained in Paragraph 27 of the Amended Complaint are denied.

28. The allegations contained in Paragraph 28 of the Amended Complaint are denied.

29. The allegations contained in Paragraph 29 of the Amended Complaint are denied.

30. The allegations contained in Paragraph 30 of the Amended Complaint are denied.

31. The allegations contained in Paragraph 31 of the Amended Complaint are denied.

32. The allegations contained in Paragraph 32 of the Amended Complaint are denied.

33. The allegations contained in Paragraph 33 of the Amended Complaint are denied.

34. The allegations contained in Paragraph 34 of the Amended Complaint are denied.

35. The allegations contained in Paragraph 35 of the Amended Complaint are denied.

36. The allegations contained in Paragraph 36 of the Amended Complaint are denied.

37. The allegations contained in Paragraph 37 of the Amended Complaint are denied.

38. The allegations contained in Paragraph 38 of the Amended Complaint are denied.

39. The allegations contained in Paragraph 39 of the Amended Complaint are denied.

40. The allegations contained in Paragraph 40 of the Amended Complaint are denied.

41. The allegations contained in Paragraph 41 of the Amended Complaint are denied.

42. The allegations contained in Paragraph 42 of the Amended Complaint are denied.

43. The allegations contained in Paragraph 43 of the Amended Complaint are denied.

44. The allegations contained in Paragraph 44 of the Amended Complaint are denied.

45. The allegations contained in Paragraph 45 of the Amended Complaint are denied.

46. The allegations contained in Paragraph 46 of the Amended Complaint are denied.

47. The allegations contained in Paragraph 47 of the Amended Complaint are denied.

48. The allegations contained in Paragraph 48 of the Amended Complaint are denied.

49. The allegations contained in Paragraph 49 of the Amended Complaint are denied.

50. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 50 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

51. The allegations contained in Paragraph 51 of the Amended Complaint are denied.

52. The allegations contained in Paragraph 52 of the Amended Complaint are denied.

53. The allegations contained in Paragraph 53 of the Amended Complaint are denied.

54. The allegations contained in Paragraph 54 of the Amended Complaint are denied.

55. The allegations contained in Paragraph 55 of the Amended Complaint are denied.

56. The allegations contained in Paragraph 56 of the Amended Complaint are denied.

57. The allegations contained in Paragraph 57 of the Amended Complaint are denied.

58. The allegations contained in Paragraph 58 of the Amended Complaint are denied.

59. The allegations contained in Paragraph 59 of the Amended Complaint are denied.

60. The allegations contained in Paragraph 60 of the Amended Complaint are denied.

61. The allegations contained in Paragraph 61 of the Amended Complaint are denied.

62. The allegations contained in Paragraph 62 of the Amended Complaint are denied.

63. The allegations contained in Paragraph 63 of the Amended Complaint are denied.

64. The allegations contained in Paragraph 64 of the Amended Complaint are denied.

65. The allegations contained in Paragraph 65 of the Amended Complaint are denied.

66. The allegations contained in Paragraph 66 of the Amended Complaint are denied.

67. The allegations contained in Paragraph 67 of the Amended Complaint are denied.

68. The allegations contained in Paragraph 68 of the Amended Complaint are denied.

69. The allegations contained in Paragraph 69 of the Amended Complaint are denied.

70. The allegations contained in Paragraph 70 of the Amended Complaint are denied.

71. The allegations contained in Paragraph 71 of the Amended Complaint are denied.

72. The allegations contained in Paragraph 72 of the Amended Complaint are denied.

73. The allegations contained in Paragraph 73 of the Amended Complaint are denied.

74. The allegations contained in Paragraph 74 of the Amended Complaint are denied.

75. The allegations contained in Paragraph 75 of the Amended Complaint are denied.

76. The allegations contained in Paragraph 76 of the Amended Complaint are denied.

77. The allegations contained in Paragraph 77 of the Amended Complaint are denied.

78. The allegations contained in Paragraph 78 of the Amended Complaint are denied.

79. The allegations contained in Paragraph 79 of the Amended Complaint are denied.

80. The allegations contained in Paragraph 80 of the Amended Complaint are denied.

81. The allegations contained in Paragraph 81 of the Amended Complaint are denied.

82. The allegations contained in Paragraph 82 of the Amended Complaint are denied.

83. The allegations contained in Paragraph 83 of the Amended Complaint are denied.

84. The allegations contained in Paragraph 84 of the Amended Complaint are denied.

85. The allegations contained in Paragraph 85 of the Amended Complaint are denied.

86. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 86 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

87. The allegations contained in Paragraph 87 of the Amended Complaint are denied.

88. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 88 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

89. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 89 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

90. The allegations contained in Paragraph 90 of the Amended Complaint are denied.

91. The allegations contained in Paragraph 91 of the Amended Complaint are denied.

92. The allegations contained in Paragraph 92 of the Amended Complaint are denied.

93. The allegations contained in Paragraph 93 of the Amended Complaint are denied.

94. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 94 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

95. The allegations contained in Paragraph 95 of the Amended Complaint are denied.

96. The allegations contained in Paragraph 96 of the Amended Complaint are denied.

97. The allegations contained in Paragraph 97 of the Amended Complaint are denied.

98. The allegations contained in Paragraph 98 of the Amended Complaint are denied.

The SpoofCard Messages

99. The allegations contained in Paragraph 99 of the Amended Complaint are denied.

100. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 100 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

101. The allegations contained in Paragraph 101 of the Amended Complaint are denied.

102. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 102 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

103. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 103 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

104. The allegations contained in Paragraph 104 of the Amended Complaint are denied.

105. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 105 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

106. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 106 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

107. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 107 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

108. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 108 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

109. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 109 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

110. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 110 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

111. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 111 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

112. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 112 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

113. Defendant denies the allegations in Paragraph 113 regarding her alleged conduct but lacks sufficient information to admit or deny the remaining allegations contained therein and therefore leaves Plaintiff to his proofs as to those other allegations.

114. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 114 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

Defendant's Alleged Scheme to Publicly Defame and Harass Plaintiff

115. The allegations contained in Paragraph 115 of the Amended Complaint are denied.

116. The allegations contained in Paragraph 116 of the Amended Complaint are denied.

117. The allegations contained in Paragraph 117 of the Amended Complaint are denied.

118. The allegations contained in Paragraph 118 of the Amended Complaint are denied.

119. The allegations contained in Paragraph 119 of the Amended Complaint are denied.

120. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 120 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

121. The allegations contained in Paragraph 121 of the Amended Complaint are denied.

122. The allegations contained in Paragraph 122 of the Amended Complaint are denied.

123. The allegations contained in Paragraph 123 of the Amended Complaint are denied.

124. The allegations contained in Paragraph 124 of the Amended Complaint are denied.

125. Defendant lacks sufficient information to admit or deny whether three websites were created concerning Plaintiff. Defendant denies the remainder of the allegations contained in Paragraph 125 of the Amended Complaint.

126. Defendant denies that she ordered the creation of any alleged accounts. Defendant lacks sufficient information to admit or deny the other

allegations contained in Paragraph 126 of the Amended Complaint and therefore leaves Plaintiff to his proofs as to those allegations.

127. Defendant denies that she ordered the creation of the alleged accounts. Defendant lacks sufficient information to admit or deny the remaining allegations contained in Paragraph 127 of the Amended Complaint and therefore leaves Plaintiff to his proofs as to those allegations.

128. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 128 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

129. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 129 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

130. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 130 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

131. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 131 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

132. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 132 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

133. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 133 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

134. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 134 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

135. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 135 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

136. The allegations contained in Paragraph 136 of the Amended Complaint are denied.

137. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 137 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

138. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 138 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

139. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 139 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

140. The allegations contained in Paragraph 140 of the Amended Complaint are denied.

141. The allegations contained in Paragraph 141 of the Amended Complaint are denied.

142. Defendant denies that NK and MK worked in concert with her or for her. Defendant lacks sufficient information to admit or deny the remainder of the allegations contained in Paragraph 142 of the Amended Complaint and leaves Plaintiff to his proofs regarding those allegations.

143. The allegations contained in Paragraph 143 of the Amended Complaint are denied.

144. The allegations contained in Paragraph 144 of the Amended Complaint are denied.

145. The allegations contained in Paragraph 145 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

146. The allegations contained in Paragraph 146 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

Defendant lacks sufficient information to admit or deny the remainder of the allegations contained in Paragraph.

147. The allegations contained in Paragraph 147 of the Amended Complaint are denied.

148. The allegations contained in Paragraph 148 of the Amended Complaint are denied.

149. The allegations contained in Paragraph 149 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

150. The allegations contained in Paragraph 150 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

151. The allegations contained in Paragraph 151 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

152. The allegations contained in Paragraph 152 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

153. The allegations contained in Paragraph 149 of the Amended Complaint are denied, as it is denied that there was a “Sebrow Internet Plan.”

Defendant lacks sufficient information to admit or deny the remainder of the allegations contained in Paragraph 153 of the Amended Complaint.

The Alleged Destruction and Concealment of Evidence

154. The allegations contained in Paragraph 154 of the Amended Complaint are denied, except to say that months after the abuse, Plaintiff received a letter from Plaintiff's attorney demanding Defendant sign an NDA.

155. The allegations contained in Paragraph 155 of the Amended Complaint are denied.

156. The allegations contained in Paragraph 156 of the Amended Complaint are denied.

157. The allegations contained in Paragraph 157 of the Amended Complaint are denied.

Allegations that Defendant Filed False Police Reports

158. The allegations contained in Paragraph 158 of the Amended Complaint are denied, except to state that Defendant did file a police report.

159. The allegations contained in Paragraph 159 of the Amended Complaint are denied, except to state that Plaintiff admits to having made a report to the police around that time.

160. The allegations contained in Paragraph 160 of the Amended Complaint are denied.

FIRST CAUSE OF ACTION

161. The allegations in Paragraph 161 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

162. The allegations in Paragraph 162 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

163. The allegations in Paragraph 163 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

SECOND CAUSE OF ACTION

164. The allegations in Paragraph 164 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

165. The allegations in Paragraph 165 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

166. The allegations contained in Paragraph 166 of the Amended Complaint are denied.

167. The allegations in Paragraph 167 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

168. The allegations contained in Paragraph 168 of the Amended Complaint are denied, as it is denied that Defendant posted, or caused to posted anything on the internet regarding Plaintiff.

169. The allegations in Paragraph 169 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

170. The allegations in Paragraph 170 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

171. The allegations contained in Paragraph 171 of the Amended Complaint are denied, as it is denied that Defendant posted, or caused to posted anything on the internet regarding Plaintiff.

172. The allegations in Paragraph 172 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

173. The allegations in Paragraph 173 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

174. The allegations in Paragraph 174 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied. Defendant further avers that Plaintiff testified that he did not lose accounts and he did not lose his job.

175. The allegations in Paragraph 175 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

THIRD CAUSE OF ACTION

176. The allegations in Paragraph 176 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

177. The allegations contained in Paragraph 177 of the Amended Complaint are denied.

178. The allegations contained in Paragraph 178 of the Amended Complaint are denied.

179. The allegations contained in Paragraph 179 of the Amended Complaint are denied.

180. The allegations in Paragraph 180 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

181. The allegations contained in Paragraph 181 of the Amended Complaint are denied.

182. The allegations contained in Paragraph 182 of the Amended Complaint are denied.

183. The allegations contained in Paragraph 183 of the Amended Complaint are denied.

184. The allegations in Paragraph 184 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

185. The allegations in Paragraph 185 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

FOURTH CAUSE OF ACTION

186. The allegations in Paragraph 186 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

187. The allegations contained in Paragraph 187 of the Amended Complaint are admitted.

188. The allegations contained in Paragraph 188 of the Amended Complaint are admitted.

189. The allegations contained in Paragraph 189 of the Amended Complaint are admitted.

190. The allegations contained in Paragraph 190 of the Amended Complaint are admitted.

191. The allegations contained in Paragraph 191 of the Amended Complaint are denied.

192. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 192 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

193. The allegations in Paragraph 193 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

194. The allegations contained in Paragraph 194 of the Amended Complaint are denied.

FIFTH CAUSE OF ACTION

195. The allegations in Paragraph 195 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

196. The allegations in Paragraph 196 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

197. The allegations in Paragraph 197 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

198. Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 198 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

199. The allegations contained in Paragraph 199 of the Amended Complaint are denied.

200. The allegations contained in Paragraph 200 of the Amended Complaint are denied.

201. The allegations contained in Paragraph 201 of the Amended Complaint are denied.

202. The allegations contained in Paragraph 202 of the Amended Complaint are denied.

203. The allegations contained in Paragraph 203 of the Amended Complaint are denied.

204. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 204 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

205. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 205 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

206. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 206 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

207. The allegations contained in Paragraph 207 of the Amended Complaint are denied.

208. The allegations in Paragraph 208 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

209. The allegations in Paragraph 209 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

SIXTH CAUSE OF ACTION

210. The allegations in Paragraph 210 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

211. The Defendant lacks sufficient information to admit or deny the allegations contained in Paragraph 211 of the Amended Complaint and therefore leaves Plaintiff to his proofs.

212. The allegations contained in Paragraph 212 of the Amended Complaint are denied.

213. The allegations contained in Paragraph 213 of the Amended Complaint are denied.

214. The allegations contained in Paragraph 214 of the Amended Complaint are denied.

215. The allegations in Paragraph 215 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

SEVENTH CAUSE OF ACTION

216. The allegations in Paragraph 216 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

217. The allegations in Paragraph 217 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

218. The allegations in Paragraph 218 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

EIGHTH CAUSE OF ACTION

219. The allegations in Paragraph 219 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

220. The allegations in Paragraph 220 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

221. The allegations in Paragraph 221 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

NINTH CAUSE OF ACTION

222. The allegations in Paragraph 222 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

223. The allegations contained in Paragraph 223 of the Amended Complaint are denied.

224. The allegations in Paragraph 224 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

225. The allegations in Paragraph 225 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

226. The allegations contained in Paragraph 226 of the Amended Complaint are denied.

227. The allegations contained in Paragraph 227 of the Amended Complaint are denied.

228. The allegations contained in Paragraph 228 of the Amended Complaint are denied.

229. The allegations contained in Paragraph 229 of the Amended Complaint are denied.

230. The allegations contained in Paragraph 230 of the Amended Complaint are denied.

231. The allegations in Paragraph 231 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

TENTH CAUSE OF ACTION

232. The allegations in Paragraph 232 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

233. The allegations in Paragraph 233 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

234. The allegations in Paragraph 234 of the Amended Complaint are a legal conclusion to which no response is required but, to the extent that a response may be required, the allegations are denied.

WHEREFORE, Defendant, Betty Sebrow, respectfully requests entry of a judgment dismissing the Amended Complaint with prejudice, awarding Defendant counsel fees and costs, and for such further relief as the Court may deem just.

KEMENY, RAMP & RENAUD, LLC
Attorneys for Defendant, Betty Sebrow

Dated: July 7, 2025

By: /s/ Alexander J. Kemeny
ALEXANDER J. KEMENY
NJ Attorney I.D.: 039842009

AFFIRMATIVE DEFENSES

Defendant, Betty Sebrow (improperly pled as “Baila Sebrow”), hereby asserts the following Affirmative Defenses:

FIRST AFFIRMATIVE DEFENSE

Counts set forth in the Plaintiff's Amended Complaint fail to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

This Court lacks subject matter jurisdiction over claims raised in Plaintiff's Amended Complaint.

THIRD AFFIRMATIVE DEFENSE

Plaintiff has not sustained any damages as a result of any alleged actions by Defendant.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff has failed to mitigate the alleged damages.

FIFTH AFFIRMATIVE DEFENSE

Alleged damages sustained by Plaintiff were the result of Plaintiff's own negligent conduct, acts, or omissions, or the acts or omissions of third parties over whom Defendant had no control.

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrines of waiver.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrines of estoppel.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the applicable statute of limitations.

TENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred due to lack of proximate causation between Defendant's alleged actions and Plaintiff's alleged injuries.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims for defamation are barred because the statements made by Defendant were true or substantially true.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiff's claims for defamation are barred because the statements made by Defendant were expressions of opinion and thus not actionable as defamation.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the absolute or qualified privileges afforded to Defendant's statements.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims for intentional infliction of emotional distress are barred because Defendant's conduct was not extreme or outrageous, and/or did not cause severe emotional distress.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims for tortious interference are barred because there was no valid contractual or prospective economic advantage, Defendant did not intentionally interfere, and/or Defendant's actions were justified or privileged.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred under the entire controversy doctrine.

SEVENTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the litigation privilege.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the First Amendment to the United States Constitution and Article I of the New Jersey Constitution, as Defendant's alleged statements were protected speech and/or involved matters of public concern.

NINETEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of res judicata and/or collateral estoppel.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred in part or in total because his damages were the result of his own conduct and/or the conduct of other non-parties to this litigation.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Defendant reserves the right to amend and/or add additional Answers, Defenses, and/or Counterclaims at a later date, as discovery proceeds and further information becomes available.

WHEREFORE, Defendant, Betty Sebrow, respectfully requests entry of a judgment dismissing the Amended Complaint with prejudice, awarding Defendant counsel fees and costs, and for such further relief as the Court may deem just.

KEMENY, RAMP & RENAUD, LLC
Attorneys for Defendant, Betty Sebrow

Dated: July 7, 2025

By: /s/ Alexander J. Kemeny
ALEXANDER J. KEMENY
NJ Attorney I.D.: 039842009

DEMAND FOR JURY

Defendant, Betty Sebrow, hereby demand trial by jury on issues so triable.

KEMENY, RAMP & RENAUD, LLC
Attorneys for Defendant, Betty Sebrow

Dated: July 7, 2025

By: /s/ Alexander J. Kemeny
ALEXANDER J. KEMENY
NJ Attorney I.D.: 039842009